

BRIAN HOGAN, et al,	)	INDEX OF EXHIBITS
	)	PLAINTIFFS' OPPOSITION TO
Plaintiffs,	)	DEFENDANTS CHEROKEE
v.	)	COUNTY, CINDY PALMER,
	)	AND SCOTT LINDSAY IN HIS
CHEROKEE COUNTY, et al.,	)	OFFICIAL CAPACITY ONLY' S
	)	MOTION FOR SUMMARY
Defendant.	)	JUDGMENT
	)	

1. Affidavit of Daniel Beerman (Authenticating Affidavit)
2. Exhibit A to Beerman Aff. – N.C. Child Welfare Manual – CPS Purpose and Philosophy, Legal Basis, and Administration
3. Exhibit B to Beerman Aff. - N.C. Child Welfare Manual – CPS Intake Policy, Protocol, and Guidance
4. Exhibit C to Beerman Aff. – N. C. Child Welfare Manual – In-Home Service Policy, Protocol, and Guidance
5. Exhibit D to Beerman Aff. - North Carolina Child Welfare Manual for CPS

Intake, CPS Assessments, In-Home, & Permanency Planning

6. Exhibit 1 – Plaintiff’s Opposition to Doc. 56, 59 – Complete Cherokee county Insurance Policy for 2016-17 Fiscal Year – Certified
7. Excerpts from Deposition of Brian Hogan (Filed Provisionally under seal pending further Order of the Court)
8. Excerpts from the Deposition of Cindy Palmer (Filed Provisionally under seal pending further Order of the Court)

Respectfully submitted, this the 29th day of October, 2020.

/s/David A. Wijewickrama  
David A. Wijewickrama  
N.C. State Bar No.: 30694  
Law Office of David A. Wijewickrama, PLLC  
95 Depot Street  
Waynesville, NC 28786  
Phone: 828-452-5801  
Fax: 828-454-1990  
*Attorney for Brian Hogan*

/s/ Ronald L. Moore  
Ronald L. Moore  
N.C. Bar No.: 9619  
P.O. Box 18402  
Asheville, NC 28814  
Phone: (828) 777-1812  
Fax: (828) 253-2717  
*Attorney for H.H.*

/s/ Melissa Jackson  
Melissa Jackson  
N.C. State Bar No.: 34013  
95 Depot Street  
Waynesville, NC 28786  
Phone: 828-452-5801  
*Attorney for Brian Hogan*

/s/ D. Brandon Christian  
D. Brandon Christian  
N.C. State Bar No.: 39579  
P.O. Box 2917  
Fayetteville, NC 28302  
Phone : (910) 750-2265  
*Attorney for H.H.*

## **CERTIFICATE OF SERVICE**

This is to certify that on October 29, 2020, a copy of the foregoing **INDEX OF EXHIBITS TO MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT** was electronically filed with the Clerk of Court using CM/ECF system, which will send notification to all counsel having made appearances in the case as follows:

Patrick Houghton Flanagan  
Cranfill, Sumner & Hartzog, L.L.P.  
2907 Providence Road  
Suite 200  
P.O. Box 30787  
Charlotte, NC 28230  
704-940-3419  
704-332-9994 (fax)  
phf@cshlaw.com  
*Attorney for Defendant Scott Lindsey  
in his individual capacity*

John L. Kubis, Jr  
Teague Campbell Dennis & Gorham, LLP  
22 South Pack Square, Suite 800  
Asheville, NC 28801  
828-254-4515  
828-254-4516 (fax)  
jkubis@teaguecampbell.com

*Attorney for Defendant Cindy Palmer  
in her individual capacity*

Sean F. Perrin  
Womble Bond Dickinson (US) LLP  
301 South College St., Suite 3500  
Charlotte, NC 28202  
704 331-4992  
704 338-7814 (fax)  
sean.perrin@wbd-us.com

*Attorney for Defendants Cherokee County,  
Cherokee County DSS, Scott Lindsey in his  
official capacity, and Cindy Palmer in her  
official capacity*

/s/ D. Brandon Christian

D. Brandon Christian  
N.C. Bar. No. 39579  
Post Office Box 2917  
Fayetteville, NC 28302  
Telephone: (910) 750-2265  
Email: brandon.christian@ncleag.com

*Attorneys for Plaintiff H.H. and Class Minors*